

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**UNITED STATES OF AMERICA,  
Plaintiff,**

**v.**

**CARLOS COLLAZO-ARROYO  
Defendant.**

**CRIMINAL NO. 97-271(HL)**

**MOTION REQUESTING RECIPROCAL DISCOVERY**

TO THE HONORABLE COURT:

COMES NOW, the United States of America, by its attorneys and very respectfully states and prays as follows:

1. In the instant case the government has and is continuing to provide to the defendant all the discovery to which he is entitled pursuant to Rule 16, Federal Rules of Criminal Procedure.

2. In order to avoid unnecessary delay at trial and unfair prejudicial surprise to the United States, the following requests are hereby made for production by defendant within ten (10) days:

a) Immediate disclosure by the defendant of all evidence discoverable under Federal Rule of Criminal Procedure 16(b)(1)(A) and (B); and 16(c). Reciprocal discovery had already been requested from the defendant by way of our discovery letters given to defendant's counsel prior to the first trial.

b) Notice of defendant's intention (if any) to offer the defense of alibi under Federal Rule of Criminal Procedure 12.1.

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c) Notice, of defendant's intention (if any) to use an insanity defense or expert testimony as to mental condition, under Federal Rule of Criminal Procedure 12.2.

d) Notice of defendant's intention (if any) to use the defense of entrapment, under Federal Rule of Criminal Procedure 12(b).

e) Notice of defendant's intention (if any) to use a defense of duress or coercion, under Federal Rule of Criminal Procedure 12(b).

f) Notice of defendant's intentions (if any) to use a defense based upon public authority under the provisions of Federal Rule of Criminal Procedure 12.3.

g) Defendant's production of any statements made by any witness they intends to use at trial, other than the defendant's himself, under Federal Rule of Criminal Procedure 26.2(a).

WHEREFORE, the United States of America respectfully requests that this Honorable Court enter an Order granting the instant motion and to compel the defendant to provide the above requested discovery as indicated.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 28th, day of March, 2005.

H. S. GARCIA  
United States Attorney

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Raymond Rivera-Esteves, Esq.

At San Juan, Puerto Rico, this 28th day of March 2005.

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